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## *Attorneys for Debtors and Reorganized Debtors*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

In re:

Bankruptcy Case No. 19-30088 (DM)

## PG&E CORPORATION,

Chapter 11

- and -

# PACIFIC GAS AND ELECTRIC COMPANY,

## Debtors.

- Affects PG&E Corporation
- Affects Pacific Gas and Electric Company
- Affects both Debtors

**REORGANIZED DEBTORS' REPORT ON  
RESPONSES TO SIXTH OMNIBUS  
OBJECTION TO CLAIMS (SATISFIED  
CLAIMS) AND REQUEST FOR ORDER BY  
DEFAULT AS TO UNOPPOSED  
OBJECTIONS**

[Re: Dkt. No. 8978]

*\* All papers shall be filed in the Lead Case, No. 19-30088 (DM).*

## **Resolving Objections Set for Hearing October 13, 2020 at 10:00 a.m. (Pacific Time)**

## **REQUEST FOR ENTRY OF ORDER BY DEFAULT**

2 PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as  
3 debtors and reorganized debtors (collectively, “**PG&E**” or the “**Debtors**” or as reorganized pursuant to  
4 the Plan (as defined below), the “**Reorganized Debtors**” in the above-captioned chapter 11 cases (the  
5 “**Chapter 11 Cases**”) hereby request, pursuant to Rule 9014-1(b)(4) of the Bankruptcy Local Rules for  
6 the United States District Court for the Northern District of California, as made applicable to these  
7 Chapter 11 Cases by the *Second Amended Order Implementing Certain Notice and Case Management*  
8 *Procedures*, entered on May 14, 2019 [Dkt No. 1996] (“**Case Management Order**”), that the Court  
9 enter an order by default on the *Reorganized Debtors’ Sixth Omnibus Objection to Claims (Satisfied*  
10 *Claims*)

 [Docket No. 8978] (the “**Sixth Omnibus Objection**”).

## **RELIEF REQUESTED IN THE SIXTH OMNIBUS OBJECTION**

12 The Sixth Omnibus Objection seeks to disallow and expunge the Proof(s) of Claim listed in the  
13 column headed “Claims to be Disallowed and Expunged” in Exhibit 1 to the Sixth Omnibus Objection.

## **NOTICE AND SERVICE**

15        *A Notice of Hearing on Reorganized Debtors' Sixth Omnibus Objection to Claims (Satisfied*  
16 *Claims)* was filed concurrently with the Sixth Omnibus Objection on September 3, 2020 [Docket No.  
17 8980] (the “**Notice of Hearing**”). The Sixth Omnibus Objection, the supporting declaration of Robb  
18 McWilliams [Docket No. 8979], and the Notice of Hearing were served as described in the *Certificate*  
19 *of Service of Andrew G. Vignali*, filed on September 15, 2020 [Docket No. 9044] (the “**Certificate of**  
20 **Service**”). As further described in the Certificate of Service, on September 4, 2020, each Proof of  
21 Claim listed on Exhibit 1 to the Sixth Omnibus Objection received the *Notice of the Reorganized*  
22 *Debtors' Sixth Omnibus Objection to Claims (Satisfied Claims)*, customized to include the claim  
23 number, debtor, claim amount and priority, and the basis for objection of the disallowed claim, and  
24 claim number and claim amount and priority of the surviving claim for each counterparty.

25 The deadline to file responses or oppositions to the Sixth Omnibus Objection has passed. The  
26 Reorganized Debtors have received the following formal and informal responses:

<b>Docket No.</b>	<b>Claimant</b>	<b>Claim No.</b>	<b>Resolution</b>
1 2 3 4 5	Informal Righetti Ranch	74986 78306	The Reorganized Debtors are attempting to resolve this matter consensually, and have agreed to an extension of Claimant's response deadline to October 16, 2020. If the objection cannot be resolved, it will be continued to the next omnibus hearing, on October 28, 2020, at 10:00 a.m.
6 7	Informal Vantage Wind Energy	9877	The Sixth Omnibus Objection has been WITHDRAWN with respect to this Claim. <i>See Docket No. 9123.</i>
8 9 10 11	9107 Krystal Dong	3672	The Reorganized Debtors are attempting to resolve this matter consensually, and have agreed with Claimant to continue the hearing on this Claim to the next omnibus hearing, on October 28, 2020, at 10:00 a.m.
12	Informal Electrify America	64181	The Claimant has withdrawn Claim No. 64181.
13 14 15 16 17	Informal KB Home Central Valley Division	65798	The Reorganized Debtors are attempting to resolve this matter consensually, and have agreed to an extension of Claimant's response deadline to October 13, 2020. If the objection cannot be resolved, it will be continued to the next omnibus hearing, on October 28, 2020, at 10:00 a.m.
18 19 20 21	Informal KB Home Central Valley, Inc.	72479	The Reorganized Debtors are attempting to resolve this matter consensually, and have agreed to an extension of Claimant's response deadline to October 13, 2020. If the objection cannot be resolved, it will be continued to the next omnibus hearing, on October 28, 2020, at 10:00 a.m.
22 23 24 25 26	Informal KB Home North Bay, Inc.	65014	The Reorganized Debtors are attempting to resolve this matter consensually, and have agreed to an extension of Claimant's response deadline to October 13, 2020. If the objection cannot be resolved, it will be continued to the next omnibus hearing, on October 28, 2020, at 10:00 a.m.
27 28	Informal KB Home Northern California Division	65542	The Reorganized Debtors are attempting to resolve this matter consensually, and have agreed to an extension of Claimant's response

<b>Docket No.</b>	<b>Claimant</b>	<b>Claim No.</b>	<b>Resolution</b>
			deadline to October 13, 2020. If the objection cannot be resolved, it will be continued to the next omnibus hearing, on October 28, 2020, at 10:00 a.m.
Informal	KB Home Sacramento, Inc.	65996 66562 74859 75226	The Reorganized Debtors are attempting to resolve this matter consensually, and have agreed to an extension of Claimant's response deadline to October 13, 2020. If the objection cannot be resolved, it will be continued to the next omnibus hearing, on October 28, 2020, at 10:00 a.m.
Informal	KB Home, A CA Corporation	65659	The Reorganized Debtors are attempting to resolve this matter consensually, and have agreed to an extension of Claimant's response deadline to October 13, 2020. If the objection cannot be resolved, it will be continued to the next omnibus hearing, on October 28, 2020, at 10:00 a.m.
Informal	Moraga 1 INV, LLC	75281 65938	The Reorganized Debtors are attempting to resolve this matter consensually, and have agreed to an extension of Claimant's response deadline to October 13, 2020. If the objection cannot be resolved, it will be continued to the next omnibus hearing, on October 28, 2020, at 10:00 a.m.
Informal	In-N-Out Burgers	59778	The Reorganized Debtors are attempting to resolve this matter consensually, and have agreed to an extension of Claimant's response deadline to October 13, 2020. If the objection cannot be resolved, it will be continued to the next omnibus hearing, on October 28, 2020, at 10:00 a.m.
Informal	Carl Arena	61475	The Reorganized Debtors are attempting to resolve this matter consensually, and have agreed to an extension of Claimant's response deadline to October 13, 2020. If the objection cannot be resolved, it will be continued to the next omnibus hearing, on October 28, 2020, at 10:00 a.m.
Informal	James Johnson	53827	The Sixth Omnibus Objection has been WITHDRAWN with respect to this Claim.

The Reorganized Debtors also received the following response, which does not oppose the Sixth Omnibus Objection or require any modification of the relief sought thereby: *County of Lake's Statement of Non-Opposition and Reservation of Rights re Reorganized Debtors' Sixth Omnibus Objection to Claims (Satisfied Claims)* [Docket No. 9167].

## **DECLARATION OF NO OPPOSITION RECEIVED**

The undersigned hereby declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury that:

1. I am an attorney with the law firm of Keller Benvenutti Kim LLP, co-counsel for the Reorganized Debtors

2. I have reviewed the Court's docket in the Chapter 11 Cases and have determined that no response has been filed with respect to the Sixth Omnibus Objection except as described herein.

3. This declaration was executed in San Francisco, California.

WHEREFORE, the Reorganized Debtors hereby request entry of an Order disallowing and expunging the Proofs of Claims listed in the column headed “Claims to be Disallowed and Expunged” in Exhibit 1 to this Request, which listed Claims are identical to those listed in Exhibit 1 to the Sixth Omnibus Objection, except as otherwise discussed above.

Dated: October 5, 2020

## KELLER BENVENUTTI KIM LLP

By: /s/ Dara L. Silveira  
Dara L. Silveira

*Attorneys for Debtors and Reorganized Debtors*